

# **EXHIBIT 4**

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE:

NATIONAL PRESCRIPTION

OPIATE LITIGATION

*RELATES TO TRACK 3 CASES*

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CASE NO. 1:17CV2804

JUDGE POLSTER

**PLAINTIFFS' JOINT PROPOSED WITNESS LIST**

<b>Witness</b>	<b>Title</b>	<b>Description/Purpose</b>
Prevoznik, Thomas	DEA, Associate Section Chief for Pharmaceutical Investigations Section of Diversion Control Division	Mr. Prevoznik is expected to testify concerning his duties and responsibilities as the Associate Section Chief for the Pharmaceutical Investigations Section of the Diversion Control Division at DEA and related to his prevent relevant employment.
Rannazzisi, Joseph	DEA, Former Head of Office of Diversion Control	Mr. Rannazzisi is expected to testify concerning his duties and responsibilities as the former Head of Office of Diversion Control, DEA and related to his previous relevant employment.
Harper-Avila, Stacy	DEA, Section Chief on Quotes	Ms. Harper-Avila will testify concerning matters related to her duties and responsibilities as Section chief on quotas at DEA related to her previous related employment.
Ashley, Demetra	DEA, Former Acting Assistant Administrator	Expected to testify concerning matters related to his/her employment and claims in this litigation
Tush, Donald	DEA, Diversion Investigator	Expected to testify concerning matters related to his/her employment and claims in this litigation
Gray, John	HDA, President and CEO	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment and related previous relevant employment
Cutler, David	Expert	The expert is expected to testify about the opinions detailed his/her expert report and on matters concerning his/her knowledge, skill, experience, education and training

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Keyes, Katherine	Expert	The expert is expected to testify about the opinions detailed his/her expert report and on matters concerning his/her knowledge, skill, experience, education and training
Lembke, Anna, Dr.	Expert	The expert is expected to testify about the opinions detailed his/her expert report and on matters concerning his/her knowledge, skill, experience, education and training
McCann, Craig	Expert	The expert is expected to testify about the opinions detailed his/her expert report and on matters concerning his/her knowledge, skill, experience, education and training
Alexander, Caleb	Expert	The expert is expected to testify about the opinions detailed his/her expert report and on matters concerning his/her knowledge, skill, experience, education and training
Rafalski, Jim	Expert	The expert is expected to testify about the opinions detailed his/her expert report and on matters concerning his/her knowledge, skill, experience, education and training
Young, Nancy	Expert	The expert is expected to testify about the opinions detailed his/her expert report and on matters concerning his/her knowledge, skill, experience, education and training
Malone, Daniel	Expert	The expert is expected to testify about the opinions detailed his/her expert report and on matters concerning his/her knowledge, skill, experience, education and training
Catizone, Carmen	Expert	The expert is expected to testify about the opinions detailed his/her expert report and on matters concerning his/her knowledge, skill, experience, education and training
Battiato, Matthew	Lake County Director of Job and Family Services	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment with the County/City and related previous relevant employment as well as matters he/she testified to at his/her deposition.
Belle, Jeffrey	Lake County, Detective Heroin Task Force	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment with the County/City and related previous relevant employment as well as matters he/she testified to at his/her deposition.
Blakely, Damian	Lake County, Narcotics, Special Agent	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment with the County/City and related previous relevant employment as well

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		as matters he/she testified to at his/her deposition.
Dombek, Brian	Lake County, Narcotics, Special Agent	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment with the County/City and related previous relevant employment as well as matters he/she testified to at his/her deposition.
DiMare, Joel	Lake County Commissioners Office, Director of Administrative Services	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment with the County/City and related previous relevant employment as well as matters he/she testified to at his/her deposition.
Fraser, Kim	Lake County, ADAMHS Board, Executive Director	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment with the County/City and related previous relevant employment as well as matters he/she testified to at his/her deposition.
Kowall, Karen	Lake County Prosecutor's Office, Ret. Chief Asst., Criminal Division	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment with the County/City and related previous relevant employment as well as matters he/she testified to at his/her deposition.
O'Brien, Lori	Lake County Adult and Children Protective Services- Program Administrator	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment with the County/City and related previous relevant employment as well as matters he/she testified to at his/her deposition.
Walters, Ronald	Lake County Sheriff's Office- Det. Capt.	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment with the County/City and related previous relevant employment as well as matters he/she testified to at his/her deposition.
Caraway, April	Trumbull County MHRB – Executive Director	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment with the County/City and related previous relevant employment as well as matters he/she testified to at his/her deposition.
Rodgers, Darryl	Trumbull County Court – Coordinator	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment and related previous

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		relevant employment as well as matters he/she testified to at his/her deposition.
Thorp, Lauren	Trumbull County HRB – Director; ASAP	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment and related previous relevant employment as well as matters he/she testified to at his/her deposition.
Tvaroch, Rick	Trumbull County Children Services – Quality Assurance Admin.)	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment and related previous relevant employment as well as matters he/she testified to at his/her deposition.
Villanueva, Tony	Trumbull County TAG – Commander	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment and related previous relevant employment as well as matters he/she testified to at his/her deposition.
Blasko, Melanie	Third Party, Lake Geauga Recovery Centers – CEO	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment and related previous relevant employment as well as matters he/she testified to at his/her deposition.
Edwards, Trey	Third Party, OH Board of Pharmacy Agent; Lake County Narcotics – Fmr. Agent	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment and related previous relevant employment as well as matters he/she testified to at his/her deposition.
Johnson, Ronna	Third Party, Pediatric Nurse Practitioner/Independent Trainer and Consultant	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment and related previous relevant employment as well as matters he/she testified to at his/her deposition.
McCallion, Nicole	Third Party, Foster Parent	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment and related previous relevant employment as well as matters he/she testified to at his/her deposition.
Blaney-Koen, Daniel	Third Party, American Medical Association	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment and related previous relevant employment as well as matters he/she testified to at his/her deposition.
Pavlich, George	Third Party, OH Board of Pharmacy	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment and related previous relevant employment as well as matters he/she testified to at his/her deposition.

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Difrangia, William	Third Party, OH Board of Pharmacy	Expected to testify concerning matters related to his/her duties and responsibilities regarding his/her employment and related previous relevant employment as well as matters he/she testified to at his/her deposition.
Huxe, Nate	Third Party, Pharmacist Pickerington Pharmacy	Expected to testify concerning matters related to his/her employment and claims in this litigation
Anderson, Kim	Third Party, Ohio Medical Board	Expected to testify concerning matters related to his/her employment and claims in this litigation
Tokarski, Justin	Third Party, Tata Consulting	Expected to testify concerning matters related to his/her employment and claims in this litigation
TBD	Third Party, Medispan	Expected to testify concerning matters related to his/her employment and claims in this litigation
TBD	Third Party, NACDS	Expected to testify concerning matters related to his/her employment and claims in this litigation
Devlin, Frank	CVS- Director of Logistics, Loss Prevention	Expected to testify concerning matters related to his/her employment and claims in this litigation
Mortelliti, John	CVS-CVS Health Director of Asset Protection Supply Chain; Lumberton DC Supervisor of Loss Prevention	Expected to testify concerning matters related to his/her employment and claims in this litigation
Propatier, Amy	CVS-Logistics Rx Services Manager and CVS DEA Compliance Coordinator	Expected to testify concerning matters related to his/her employment and claims in this litigation
Vernazza, Mark	CVS-CVS Pharmacy Inc., Senior Legal Counsel	Expected to testify concerning matters related to his/her employment and claims in this litigation
Burtner, Aaron	CVS-SOM Manager and Loss Prevention Analyst	Expected to testify concerning matters related to his/her employment and claims in this litigation
Duggar, Terrence	CVS- DC Logistics and Loss Prevention Manager	Expected to testify concerning matters related to his/her employment and claims in this litigation
Baker, Kelly	CVS-SOMS Analyst	Expected to testify concerning matters related to his/her employment and claims in this litigation
Hinkle, Sherri	CVS- Indianapolis DC Picker and Packer; Inventory Control	Expected to testify concerning matters related to his/her employment and claims in this litigation

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Davis, Thomas	CVS Corporate Vice President Professional Services, Senior Director Pharmacy Operations	Expected to testify concerning matters related to his/her employment and claims in this litigation
Grimes, Joseph	CVS Pharmacy Professional Practices, Manager	Expected to testify concerning matters related to his/her employment and claims in this litigation
Hartman, Tara	CVS Pharmacy CT3 Pharmacist	Expected to testify concerning matters related to his/her employment and claims in this litigation
Harrington, Nicole	CVS Pharmacy Professional Services Senior Director Pharmacy Professional Services	Expected to testify concerning matters related to his/her employment and claims in this litigation
Tenkut, Papatya	CVS Corporate Pharmacy Professional Practice	Expected to testify concerning matters related to his/her employment and claims in this litigation
Travassos, Michelle	CVS Corporate Pharmacy Professional Practice	Expected to testify concerning matters related to his/her employment and claims in this litigation
Boyd, William	CVS Data 30b6 witness	Expected to testify concerning matters related to his/her employment and claims in this litigation
Aivazis, John	CVS Pharmacy CT3 Pharmacist	Expected to testify concerning matters related to his/her employment and claims in this litigation
Mooney, Emily	HBC/Giant Eagle- Retail Pharmacy Employee	Expected to testify concerning matters related to his/her employment and claims in this litigation
Chunderlik, George	HBC/Giant Eagle- Corporate and/or Regional Employee; Manager, Pharmacy Training and Compliance	Expected to testify concerning matters related to his/her employment and claims in this litigation
Shaheen, Rick	HBC/Giant Eagle- Corporate and/or Regional Employee; Manager, Pharmacy Security	Expected to testify concerning matters related to his/her employment and claims in this litigation
Miller, Christopher	HBC/Giant Eagle- Data 30b6 witness	Expected to testify concerning matters related to his/her employment and claims in this litigation
Tsipakis, James	HBC/Giant Eagle- Executive Vice President Pharmacy/Health and Wellness	Expected to testify concerning matters related to his/her employment and claims in this litigation

<b>Witness</b>	<b>Title</b>	<b>Description/Purpose</b>
Glover, Amanda	Rite Aid Corporate; VP Regulatory Affairs	Expected to testify concerning matters related to his/her employment and claims in this litigation
Gosnik, Kristin	Rite Aid Regional Dispensing Personnel; Pharmacy District Manager	Expected to testify concerning matters related to his/her employment and claims in this litigation
Jacobson, Scott	Rite Aid- Corporate Personnel; VP Pharmacy Operations	Expected to testify concerning matters related to his/her employment and claims in this litigation
Shirk, Lynn	Rite Aid- Data 30b6 witness	Expected to testify concerning matters related to his/her employment and claims in this litigation
Hart, Janet	RiteAid- Director, Government Affairs	Expected to testify concerning matters related to his/her employment and claims in this litigation
Joyce, Brian	Walgreens Pharmacy Supervisor/ District Manager	Expected to testify concerning matters related to his/her employment and claims in this litigation
Demay, Julie	Walgreens- Pharmacist, Pharmacy Manager for CT3 stores	Expected to testify concerning matters related to his/her employment and claims in this litigation
Provost-Gorman, Kristie	Walgreens Director Strategic Planning and Analytics Loss Prevention	Expected to testify concerning matters related to his/her employment and claims in this litigation
Prignano, Joe	Walgreens Director Pharmacy and Retail Operations	Expected to testify concerning matters related to his/her employment and claims in this litigation
Kneller, Steve	Walgreens General Manager; Director of Distribution	Expected to testify concerning matters related to his/her employment and claims in this litigation
Creek, Cheryl	Walgreens Director Pharmacy Ops Optimization	Expected to testify concerning matters related to his/her employment and claims in this litigation
Arends, Jon	Walgreens Data 30b6 Witness	Expected to testify concerning matters related to his/her employment and claims in this litigation
Malusa, Sherry	Walgreens- Sr. Director Compliance	Expected to testify concerning matters related to his/her employment and claims in this litigation
Polster, Tasha	Walgreens - Vice President of Pharmacy Quality, Compliance, and Patient Safety.	Expected to testify concerning matters related to his/her employment and claims in this litigation



<b>Witness</b>	<b>Title</b>	<b>Description/Purpose</b>
Martin, Barbara	Walgreens – Manager, Inventory Management / Manager - Rx Supply Chain, Stores	Expected to testify concerning matters related to his/her employment and claims in this litigation
Bratton, Ed	Walgreens – Manager, Pharmaceutical Integrity (Southern Operation (FL))	Expected to testify concerning matters related to his/her employment and claims in this litigation
Bish, Deb	Walgreens – Function Manager	Expected to testify concerning matters related to his/her employment and claims in this litigation
Swords, Rex	Walgreens - VP, Pharmacy Retail Operations and Planning	Expected to testify concerning matters related to his/her employment and claims in this litigation
Tomson, George	Walgreens- Sr. Manager, Professional Affairs, Pharmacy & Healthcare	Expected to testify concerning matters related to his/her employment and claims in this litigation
Whited, James	Walgreens - Healthcare Supervisor Cleveland/Akron at Walgreens	Expected to testify concerning matters related to his/her employment and claims in this litigation
Murray, Denman Jr.	Walgreens - Director, Inventory Management / Director - Rx Supply Chain Retail	Expected to testify concerning matters related to his/her employment and claims in this litigation
Hunter, William	Walgreens - District Manager	Expected to testify concerning matters related to his/her employment and claims in this litigation
Bancroft, Wayne	Walgreens - Lead Business Systems Analyst, IT Integration	Expected to testify concerning matters related to his/her employment and claims in this litigation
Nelson, Brad	Wal Mart- Director, Health and Wellness Practice Compliance	Expected to testify concerning matters related to his/her employment and claims in this litigation
Oldfather, John	Global Investigator, Global Investigations and Asset Protection	Expected to testify concerning matters related to his/her employment and claims in this litigation
Militello, Lori	Wal Mart CT3 Pharmacist	Expected to testify concerning matters related to his/her employment and claims in this litigation
Townzen, Darren	Wal Mart Data 30B6 Witness	Expected to testify concerning matters related to his/her employment and claims in this litigation

<b>Witness</b>	<b>Title</b>	<b>Description/Purpose</b>
Beahm, Greg	Wal Mart Director Global Investigations	Expected to testify concerning matters related to his/her employment and claims in this litigation
Mosher-Parker	Wal Mart, Digital Operations	Expected to testify concerning matters related to his/her employment and claims in this litigation
Mack, Deborah	Wal Mart- Senior Director, Health & Wellness Practice Compliance	Expected to testify concerning matters related to his/her employment and claims in this litigation
Abernathy, Jeff	Walmart- Operations Manager (DC 6045); Manager, Pharmacy Order Monitoring; Operations Manager (DC 6045)	Expected to testify concerning matters related to his/her employment and claims in this litigation
Johnson, Miranda	Walmart- Director, Controlled Substances, Health & Wellness Practice Compliance	Expected to testify concerning matters related to his/her employment and claims in this litigation
McMillon, Doug	Walmart- President and Chief Executive Officer	Expected to testify concerning matters related to his/her employment and claims in this litigation
Spruell, Kristy	Walmart- Senior Manager, Logistics; Manager, Pharmacy Order Monitoring	Expected to testify concerning matters related to his/her employment and claims in this litigation
Campbell, Casey	Walmart – Director of Regulatory Compliance	Expected to testify concerning matters related to his/her employment and claims in this litigation
Reed, Roxanne	Walmart- Manager, Technology, Health & Wellness Practice Compliance; Senior Analyst, Health & Wellness Practice Compliance; Senior Manager, Health & Wellness Practice Compliance	Expected to testify concerning matters related to his/her employment and claims in this litigation
Sullins, Ramona	Walmart- Senior Manager (previously Manager), Health & Wellness Distribution	Expected to testify concerning matters related to his/her employment and claims in this litigation
Hiland, Susanne	Walmart - Director, Pharmacy Professional Services and Government Relations; Senior Director, Health & Wellness Regulatory Affairs; Senior Director, Health & Wellness	Expected to testify concerning matters related to his/her employment and claims in this litigation

Witness	Title	Description/Purpose
	Professional Relations & Clinical Quality Assurance; Senior Director, Health & Wellness Quality Assurance & Clinical Services; Senior Director, Health & Wellness Professional Relations & Practice Clinical Services	

In serving this witness list, Plaintiffs specifically reserve the right to amend, supplement, or otherwise modify these disclosures if new or modified information is provided at any point. Plaintiffs reserve the right to amend this list subject to any further discovery depositions of defendant employees that are still being scheduled, such as those allowed by Special Master Cohen's sanction order regarding Walmart. Plaintiffs also reserve the right to supplement and/or to amend its lists with any witnesses identified on any party's witness lists, including any party who later settles or is severed or dismissed. Plaintiffs further reserve the right to supplement and/or to amend this witness list in response to rulings of the Court on pretrial motions. Plaintiffs reserve the right to amend and/or supplement its witness list based on testimony and witness disclosures presented by Defendants.

Plaintiffs reserve the right to invoke any and all reservations set forth by Defendants in their witness list disclosures.

Respectfully Submitted,

s/ W. Mark Lanier  
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